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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

EXXON MOBIL CORPORATION,

Petitioner/Plaintiff,

v.

SANTA BARBARA COUNTY
BOARD OF SUPERVISORS,

Respondent/Defendant,

and

ENVIRONMENTAL DEFENSE
CENTER, GET OIL OUT!, SANTA
BARBARA COUNTY ACTION
NETWORK, SIERRA CLUB,
SURFRIDER FOUNDATION,
CENTER FOR BIOLOGICAL
DIVERSITY, and WISHTOYO
FOUNDATION,

Proposed Defendant-
Intervenors.

Case No. 2:22-cv-03225(DMG MRWx)

**DECLARATION OF MARGARET
HALL IN SUPPORT OF MOTION
TO INTERVENE**

Hon. Dolly Gee

Hearing: October 21, 2022

Time: 9:30 a.m.

Place: Courtroom 8C,
350 West 1st Street, Los Angeles

1 I, Margaret Hall, declare as follows:

2 1. I am a Senior Attorney for the Environmental Defense Center
3 (“EDC”). My business address and phone number are 906 Garden Street, Santa
4 Barbara, CA 93101, (805) 963-1622.

5 2. In my capacity as EDC Senior Attorney, I, along with my colleague
6 EDC Chief Counsel Linda Krop, have the primary responsibility for the proposed
7 intervention of our clients EDC, Get Oil Out!, Santa Barbara County Action
8 Network, Sierra Club and Surfrider Foundation, alongside attorneys at the Center
9 for Biological Diversity (“CBD”) who represent CBD and Wishtoyo Foundation
10 in this joint effort to intervene in the above-captioned case. I have personal
11 knowledge of the following facts and if called as a witness, would testify to these
12 facts under oath.

13 3. On July 28, 2022, I called Mary Pat Barry, counsel of record for
14 respondent and defendant Santa Barbara County Board of Supervisors, on the
15 telephone. I informed her of our clients’ intentions to file a motion to intervene in
16 the above-captioned case and she informed me that the County will take no
17 position on that motion.

18 4. On August 10, 2022, I called Dawn Sestito, counsel of record for
19 petitioner and plaintiff ExxonMobil Corporation, on the telephone and left a
20 message requesting to schedule a meet and confer regarding our clients’
21 intentions to file a motion for intervention in the above-captioned case. On the
22 same day, I followed up with Ms. Sestito via email. She returned my email and
23 we scheduled a phone call for August 15, 2022.

24 5. On August 15, 2022, I had a phone call with Ms. Sestito to discuss
25 our clients’ intentions to move for intervention in this case. We discussed several
26 questions Ms. Sestito had to help inform her client regarding our position, and she
27 let me know that she would respond later in the week via email to let us know
28 ExxonMobil’s position on our motion. We also discussed potential hearing dates,

1 and I proposed a date of September 30, 2022. Ms. Sestito informed me she had a
2 conflict on that date, so we discussed additional potential hearing dates. The next
3 Friday, October 7, is listed as closed on the Court's website. On the subsequent
4 Friday, October 14, I have an existing conflict. The next available date was
5 October 21; and we both confirmed we are available on that date.

6 6. On August 21, 2022, I received an email from Ms. Sestito informing
7 me that ExxonMobil plans to oppose the motion to intervene.

8 7. On August 22, 2022, I emailed Ms. Barry to ask whether the County
9 is available for the intervention hearing on October 21, and she responded that
10 same day confirming that the County is available.

11 I declare under penalty of perjury that the foregoing is true and correct to
12 the best of my knowledge, information, and belief.

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14 Executed at Santa Barbara, California on August 26, 2022.

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17 Margaret Hall
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